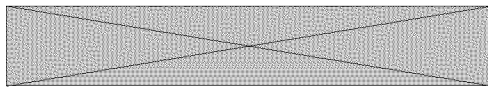


To: Faustino, Al SPK[Al.Faustino@usace.army.mil]; Nadia Burleson[nb@burlesonconsulting.com]
Cc: Wirschafter, Joshua[Wirschafter.Joshua@epa.gov]; Greg Reller[gr@burlesonconsulting.com];
McMindes, Daniel C SPD@SPK[Daniel.C.McMindes@usace.army.mil]
From: Noah Perch-Ahern
Sent: Wed 3/16/2016 12:15:21 AM
Subject: RE: Diamond X/ARCO - Deposition of Greg Reller
removed.txt

.....
,,,,,,

I would propose that Josh and I speak and then Josh can tell Al once we have an understanding that he's comfortable with. Then with that comfort, Al can clear Burleson to produce documents pursuant to the subpoena. That sound good? Josh, I'll call you now...

Noah



Noah Perch-Ahern | Partner

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067

Main: 310.553.3000 | Direct: 310.556.7842 | Fax: 310.556.2642

E-Mail: nperchahern@glaserweil.com | www.glaserweil.com



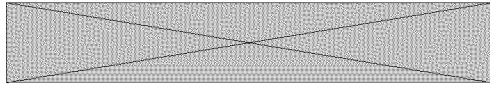
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From: Faustino, Al SPK [mailto:Al.Faustino@usace.army.mil]
Sent: Tuesday, March 15, 2016 5:13 PM
To: Noah Perch-Ahern; Nadia Burleson
Cc: Wirschafter.Joshua@epa.gov; Greg Reller; McMindes, Daniel C SPD@SPK
Subject: RE: Diamond X/ARCO - Deposition of Greg Reller

I will try tomorrow when I have some time but this is really EPA's call because it is their records that is being requested. We just enforce the terms of the contract.

From: Noah Perch-Ahern [mailto:nperchahern@glaserweil.com]
Sent: Tuesday, March 15, 2016 4:50 PM
To: Nadia Burleson <nb@burlesonconsulting.com>; Faustino, Al SPK <Al.Faustino@usace.army.mil>
Cc: Wirschafter.Joshua@epa.gov; Greg Reller <gr@burlesonconsulting.com>; McMindes, Daniel C SPD@SPK <Daniel.C.McMindes@usace.army.mil>
Subject: [EXTERNAL] RE: Diamond X/ARCO - Deposition of Greg Reller

Hi Al, can you please give me a call at the number below? I think we should be able to work this out pretty easily. Thanks much, -Noah



Noah Perch-Ahern | Partner

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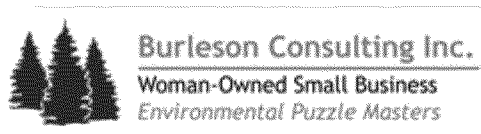


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From: Nadia Burleson [<mailto:nb@burlesonconsulting.com>]
Sent: Tuesday, March 15, 2016 4:48 PM
To: Al.Faustino@usace.army.mil; Noah Perch-Ahern
Cc: Wirtschafter.Joshua@epa.gov; Greg Reller; McMIndes, Daniel C SPD@SPK
Subject: FW: Diamond X/ARCO - Deposition of Greg Reller

Hi Al & Noah:

I just got off the phone with Noah, attorney for Diamond X. I explained that Burleson is holding off releasing any files until we get approval from the USACE, as they are our client for the EPA-Leviathan project. I directed Noah to talk with Al regarding this issue. Please keep me posted. Thank you.



Nadia Burleson, PE

(916) 984-4651 ext. 115

(916) 768-1606 (cell)

From: Noah Perch-Ahern [<mailto:nperchahern@glaserweil.com>]
Sent: Thursday, March 10, 2016 9:12 PM
To: Greg Reller <gr@burlesonconsulting.com>
Cc: Nadia Burleson <nb@burlesonconsulting.com>; Wirtschafter, Joshua <Wirtschafter.Joshua@epa.gov>; McMIndes, Daniel C SPD@SPK

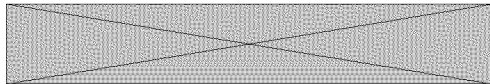
<Daniel.C.McMindes@usace.army.mil>; O'Brien, Brad (ENRD)

Subject: RE: Diamond X/ARCO - Deposition of Greg Reller

Folks: I have rescheduled the subpoena for April 12 in Sacramento. Greg/Nadia, this email provides service per our prior agreement that you'll accept service. Although the subpoena says 9am, let's plan on 10am. Thanks.

Thanks,

Noah



Noah Perch-Ahern | Partner

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From: Greg Reller [<mailto:gr@burlesonconsulting.com>]

Sent: Tuesday, March 8, 2016 7:05 PM

To: Noah Perch-Ahern

Cc: Nadia Burleson; Wirtschafter, Joshua; McMindes, Daniel C SPD@SPK; O'Brien, Brad (ENRD)

Subject: Re: Diamond X/ARCO - Deposition of Greg Reller

Noah:

I am available March 30, 31, And April 1; and any day other than April 4 the following two weeks

Greg

Sent from my iPad

On Mar 8, 2016, at 16:11, Noah Perch-Ahern <nperchahern@glaserweil.com> wrote:

Hello all: to accommodate some scheduling and procedural issues, we're going to move the date for the deposition until after Greg is back from vacation. Greg and Josh (and Brad, if

you're planning on attending), can you please let me know your availability the week of the 28th and 4th for Greg's deposition in Sacramento?

Many thanks to all and I apologize for the inconvenience.

Noah

Noah Perch-Ahern | Partner

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067

Main: 310.553.3000 | Direct: 310.556.7842 | Fax: 310.556.2642

E-Mail: nperchahern@glaserweil.com | Blocked www.glaserweil.com

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From: Nadia Burleson [<mailto:nb@burlesonconsulting.com>]
Sent: Thursday, March 3, 2016 3:26 PM
To: Noah Perch-Ahern; Greg Reller
Cc: Wirschafter, Joshua; McMindes, Daniel C SPD@SPK
Subject: RE: Diamond X/ARCO - Deposition of Greg Reller

Hi Noah:

Just to confirm that we received this. Greg will talk to Josh and be ready for the deposition.
Thank you.

Nadia Burleson, PE

(916) 984-4651 ext. 115

(916) 768-1606 (cell)

From: Noah Perch-Ahern [<mailto:nperchahern@glaserweil.com>]
Sent: Thursday, March 03, 2016 10:32 AM
To: Nadia Burleson <nb@burlesonconsulting.com>; Greg Reller <gr@burlesonconsulting.com>
Cc: Wirschafter, Joshua <Wirschafter.Joshua@epa.gov>
Subject: Diamond X/ARCO - Deposition of Greg Reller

Dear Nadia and Greg, it was nice speaking with you yesterday. This confirms service of the attached subpoena, which you kind agreed to accept yesterday. Please note per our call that to make things simple, I asked for your "project file" (deadline by the end of next week). I set the depo in Sacramento on the 14th. This could change depending on scheduling with other interested parties, but let's plan on it for now.

Thank you,

Noah

Noah Perch-Ahern | Partner

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